

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

JESSICA JONES, et al.,

Plaintiffs,

v.

VARSITY BRANDS, LLC, et al.

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

**INDIRECT PURCHASER PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO
FILE A MEMORANDUM OF LAW WITH EXCESS PAGES AND REQUEST FOR
EXTENSION OF TIME TO FILE**

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MEMORANDUM OF LAW WITH EXCESS PAGES AND REQUEST FOR EXTENSION OF TIME TO
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Indirect Purchaser Plaintiffs Jessica Jones, Cristina Lorenzen, and Amy Coulson (“Plaintiffs”), by and through the undersigned class counsel, hereby move this Court under Local Rule 7.2(e) for leave to file a memorandum of law with up to five excess pages in support of their Motion For An Award Of Attorneys’ Fees, For Reimbursement Of Expenses, And For Service Awards For The Class Representatives. In addition, Plaintiffs respectfully request leave to file the motion one day later on Tuesday, September 3, 2024, because the deadline specified in the Court’s preliminary approval order, ECF No. 612, happens to fall on Labor Day. Defendants do not oppose the requests.

In their forthcoming motion for approval of fees and costs, Plaintiffs must show that the amount of attorneys’ fees requested is fair and reasonable, that the expenses incurred by Class Counsel were reasonably necessary to advance the litigation on behalf of the Settlement Classes, and that the Class Representatives are deserving of the requested service awards. While Plaintiffs will make every effort to be as concise as possible, in order to fully detail the extensive work performed by Class Counsel and the Class Representatives over three years, Plaintiffs seek five additional pages in excess of the 20 pages permitted under Local Rule 7.2(e). On July 5, 2023, the Court granted a similar motion brought by the *Fusion Elite* Plaintiffs prior to their motion for fees and costs. *See Fusion Elite All Stars, et al. v. Varsity Brands, LLC, et al.*, No. 2:20-CV-2600-SHL-tmp (W.D. Tenn.), ECF No. 341 (granting leave for five additional pages).

In addition, on June 18, 2024, in its order granting preliminary approval, the Court ordered that Plaintiffs file their motion for fees and costs by September 2, 2024. *See* ECF No. 612. September 2 happens to fall on Labor Day. Plaintiffs thus respectfully request leave to file their motion for fees and costs one day after the Labor Day holiday, on Tuesday, September 3, 2024. Plaintiffs’ counsel wish not to labor, nor entice the Court or others to labor, on the upcoming holiday.

Dated: August 28, 2024

Respectfully submitted,

s/ David H. Seidel

Joseph R. Saveri*
Ronnie Seidel Spiegel*+
David Seidel*
Kevin E. Rayhill*
Elissa A. Buchanan*
JOSEPH SAVERI LAW FIRM, LLP
601 California Street, Suite 1505
San Francisco, California 94108
Telephone: (415) 500-6800
Facsimile: (415) 395-9940
jsaveri@saverilawfirm.com
rspiegel@saverilawfirm.com
dseidel@saverilawfirm.com
krayhill@saverilawfirm.com
eabuchanan@saverilawfirm.com

Van Turner Jr. (TN Bar No. 22603)
TURNER FEILD, PLLC
2650 Thousand Oaks Blvd., Suite 2325
Memphis, Tennessee 38118
Telephone: (901) 290-6610
Facsimile: (901) 290-6611
VTurner@TurnerFeildLaw.com

Richard M. Paul III*
Ashlea Schwarz*
PAUL LLP
601 Walnut, Suite 300
Kansas City, Missouri 64106
Telephone: (816) 984-8100
rick@paulllp.com
ashlea@paulllp.com

Jason S. Hartley*
HARTLEY LLP
101 West Broadway, Suite 820
San Diego, CA 92101
Telephone: (619) 400-5822
hartley@hartleyllp.com

Daniel E. Gustafson*
Daniel C. Hedlund*
Daniel J. Nordin*
GUSTAFSON GLUEK PLLC
Canadian Pacific Plaza
120 South Sixth Street, Suite 2600
Minneapolis, MN 55402
Telephone: (612) 333-8844
Facsimile: (612) 339-6622
dgustafson@gustafsongluek.com
dhedlund@gustafsongluek.com
dnordin@gustafsongluek.com

* Admitted *pro hac vice*
+ Located in Washington State

Attorneys for Plaintiffs

CERTIFICATE OF CONSULTATION

I hereby certify, pursuant to Local Rule 7.2(a)(1)(B), that on August 28, 2024, I consulted with all counsel for Defendants, advising them that Plaintiffs intended to file a motion seeking the relief set out above and asking if they opposed. The following counsel confirmed that Defendants do not oppose the requested relief:

- Steven Kaiser for the Varsity Defendants
- Nicole Riccio for Defendant U.S. All Star Federation
- Brendan P. Gaffney for Defendant Jeff Webb
- Christopher Tayback for Bain Defendants
- Lucy Baeurle for Charlesbank Defendants

/s/ David H. Seidel

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